

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF OKLAHOMA

FILED

FEB 19 2015

DAVID Joseph Teays

Plaintiff

Phil Lombardi, Clerk  
U.S. DISTRICT COURT

vs.

Case Number:

(To be supplied by Court Clerk)

15 CV - 88 JED - TLW

TULSA COUNTY Sheriff DEPT ETAL

ARMOR correctional Health Inc ETAL

STANLEY Glanz

KATHY Lohr

Defendant(s)

Current Location (including Address) of Confinement:  
DAVID L. MOSS Criminal Justice CTR.  
TULSA CO JAIL  
300 North Denver  
TULSA OK 74103

Prisoner Number: 1134837

**CIVIL RIGHTS COMPLAINT PURSUANT TO 42 U.S.C. § 1983**

**A. Parties**

1) Plaintiff DAVID Joseph Teays is a citizen of OKLAHOMA who presently resides at 300 north Denver, Tulsa Oklahoma

(State)  
(Mailing address or place of confinement)

2) Defendant STANLEY Glanz is a citizen of TULSA, OKLAHOMA,  
(Name of first defendant) (City, State)

and is employed as Sheriff of Tulsa co. sheriff DePT.  
(Position and title, if any)

At the time the claim(s) alleged in this complaint arose, was this defendant acting under the color of state law?  Yes  No

If your answer is yes, briefly explain: He is The Sheriff He is in charge of Tulsa co.Jail.

3) Defendant KATH Lohr is a citizen of TULSA Oklahoma,  
(Name of second defendant) (City, State)

and is employed as Health care Service Administrator/Armor correction Health Inc  
(Position and title, if any)

At the time the claim(s) alleged in this complaint arose, was this defendant acting under the color of state law?  Yes  No

Mail  No Cert Svc  No Orig Sign

C/J  C/MJ  C/Ret'd  No Env  
 No Cpls  No Env/Cpls  O/t  D/R/H

PR-01 (07/08)

If your answer is yes, briefly explain: She is incharge of ARMOR corrections  
Health Services at Tulsa Co JAIL,

[You may attach one additional page (8 1/2" x 11") to furnish the above information for additional defendants.]

**B. Jurisdiction**

- 1) Jurisdiction is asserted pursuant to: (Check one)

42 U.S.C. §1983 (applies to state prisoners)

Bivens v Six Unknown Named Agents of Fed. Bureau of Narcotics  
403 U.S. 388 (1971) and 28 U.S.C. §1331 (applies to fed. prisoners)

- 2) Jurisdiction also is invoked pursuant to 28 U.S.C. §1343(a)(3). (If you wish to assert jurisdiction under different or additional statutes, you may list them below.)
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**C. Nature of Case**

- 1) Briefly state the background of your case. I WAS DIAGNOSED SEVERE SPINAL CORD INJURIES  
TULSA CO JAIL/ARMOR CORRECTIONS HEALTH, DELAY/DENY MEDICAL TREATMENT  
CAUSING PERMANENT DAMAGE TO MY SPINAL CORD.

**D. Cause of Action**

- 1) I allege that the following of my constitutional rights, privileges or immunities have been violated and that the following facts form the basis for my allegations: [If necessary, you may attach up to two additional pages (8 1/2" x 11") to explain any allegation or to list additional supporting facts.]

a) (1) Count I: My Rights To Medical Treatment.

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- (2) Supporting Facts: (Include all facts you consider important, including names of persons involved, places and dates. Describe exactly how each defendant is involved. State the facts clearly in your own words without citing legal authority or argument.)

ON AUG 11.2014 TULSA CO JAIL ET AL/ARMOR CORRECTIONS  
HEALTH SERVICES ET AL, WAS INFORMED BY ST JOHN  
HOSPITAL, THE HOSPITAL REPORTED TO DEFENDANTS THE FOLLOWING  
CONT!

b) (1) Count II: My Constitutional Rights To NOT Be  
Subjected To cruel AND unusual Punishment

EXTRA PAGE 1

PART D CAUSE OF ACTION

(A) (2) SUPPORTING FACTS; CONT: C-3 C-4 C-6 C-7 NERVE ROOT COMPRESSION, C-6 C-7 FRACTURE TO PREVIOUS FUSION, ALSO A BROKEN TITANIUM SCREW AT C-7 CAUSING THE FUSION TO BECOME UNSTABLE, ALSO A SEVERE SPINAL CORD INJURY (SEVERE BRUISE) AT C-3 C-4 THE MEDICAL STAFF AND KATHY LOHER DELIBERATELY DISREGARDED THE RECOMMENDATIONS OF ST. JOHNS E.R. DOCTOR THE REPORT OF THE ABOVE FINDINGS FROM A MRI DONE AT THE REQUEST OF THE MEDICAL STAFF AT TULSA CO JAIL ON 8-10-14 AFTER

THE ER. DOCTOR CONSULTED WITH A NEURO SURGEON INSTRUCTING THE DEFENDANTS TO SEND THE PLAINTIFF TO A NEURO SURGEON WITHIN 5 DAYS DUE TO THE SEVERITY OF HIS INJURY. THE DEFENDANTS DELAYED THIS BY 6 WEEKS CAUSING MORE PERMANENT INJURY.

(B) (2) SUPPORTING FACTS; (CONT) RENDERING THE PLAINTIFF INCAPABLE OF CONTROLLING HIS BODY FUNCTIONS AS THE PLAINTIFF DEFECATED ON HIMSELF. THE DEFENDANTS KNOWINGLY AND DELIBERATELY DISREGARDED THE PLAINTIFF'S GROTESQUE STATE AND FORCED HIM TO MARINATE IN HIS OWN EXCRIMENTS FOR A EXTENDED AMOUNT OF TIME CONFINED TO A CELL, HE HAD NO WAY OF CLEANING UP UNTIL THE DEFENDANTS ALLOWED HIM TO DO SO.

EXTRA PAGE 2

PART D CAUSE OF ACTION

(C) (2) SUPPORTING FACTS (cont) while chained AT THE ANKLES, AND Black Boxed with A Belly chain The Defendants Knowingly, Deliberately Forced The Plaintiff To Bend AT 90° AT The WAIST AND WALK while His Knees Are Bent AT 45° AGAINST His Surgeon's orders To NOT Bend, STOOP, Reach or Pick Up anything until further notice, only Being under 1 month of The reconstructive Surgery on The Plaintiff's Cervical SPine The Plaintiff Still Being off BALANCE Fell in The Transport VAN # 0979 a NON-HANDICAP ACCESSABLE VAN, The Plaintiff Fell Striking His neck and Shoulder on His Right Side while He was wearing A Hard cervical collar, The Blow The Plaintiff Took to a Post. OP. cervical SPINE, causing The Plaintiff to Retain The SPINE THAT WILL REQUIRE a undetermined amount of Surgery & The Rehab That HESITILL HAS Being Denied.

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- (2) Supporting Facts: (Include all facts you consider important, including names of persons involved, places and dates. Describe exactly how each defendant is involved. State the facts clearly in your own words without citing legal authority or argument.)

On Nov. 21 2014 A Nurse Employed By SAID Defendants  
Provided The Plaintiff with The medication for  
another INMATE, The wrong medication Rendered  
cont.

- c) (1) Count III: Violation of The American Disabilities Act.
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- (2) Supporting Facts: (Include all facts you consider important, including names of persons involved, places and dates. Describe exactly how each defendant is involved. State the facts clearly in your own words without citing legal authority or argument.)

On Nov. 06 2014 while Being TransPorted To AND  
From TULSA co. court The Plaintiff was Forced To  
Climb into A VAN That is NOT HANDICAP Accessable  
cont.

**E. Request for Relief**

- 1) I believe that I am entitled to the following relief: \$65,121,134.34 / Sixty Five  
million, ONE hundred Twenty one Thousand, one hundred thirty  
Four Dollars, And Thirty Four cents For Pain & suffering & mental  
AnGish.

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Original Signature of Attorney (if any)

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Original Signature of Plaintiff

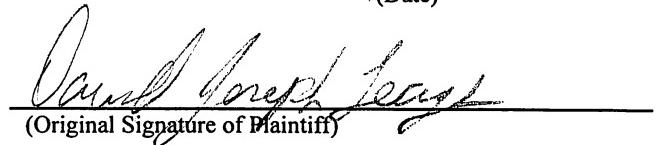
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Attorney's full address and telephone number

**DECLARATION UNDER PENALTY OF PERJURY**

The undersigned declares (or certifies, verifies, or states) under penalty of perjury that he/she is the plaintiff in the above action, that he/she has read the above complaint and that the information contained therein is true and correct. 28 U.S.C. §1746. 18 U.S.C. §1621.

Executed at DAVID L MOSS CRIMINAL JUSTICE CENTER,  
300 N Denver Ave TULSA OK 74103 on Feb. 16, 2015.  
(Location) (Date)

  
(Original Signature of Plaintiff)

repose  
02/19/2015  
DISPOSITIONS \$0001.820

11333 400 ZIP 21127

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Assimilated 01/01/15

**RECEIVED**

FEB 19 2015

Phil Lombardi, Clerk  
U.S. DISTRICT COURT

clerk:

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF OKLAHOMA  
333 LAWST SOUTH ST #411  
TULSA OK 74103-3819

DAYTON TAYS  
134833  
DL 111  
300 S Denver  
70134-38103

LEGAL MAIL